

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Kedar SALTER

Case:2:19-mj-30072
Judge: Unassigned,
Filed: 02-21-2019 At 03:01 PM
IN RE: SEALED MATTER (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 29, 2018 to February 20, 2019 in the county of Wayne in the
District of _____, the defendant(s) violated:*Code Section*

18 U.S.C. § 922(g)(1)

Offense Description

Felon in possession of a firearm previously traveled in interstate commerce

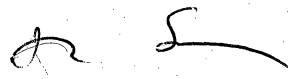
This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*

Special Agent Danielle Stefanovski, A.T.F.

Printed name and title

Sworn to before me and signed in my presence.

Date: February 21, 2019City and state: Detroit, Michigan*Judge's signature*

Hon. R. Steven Whalen, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Special Agent Danielle Stefanovski, being duly sworn, state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), United States Department of Justice, and have been so employed since March 2018. I was also previously a Special Agent with the United States Secret Service for one-and-a-half years. I have a Bachelor of Business Administration from the University of Michigan. I am a graduate of the Criminal Investigator Training Program and the ATF Special Agent Basic Training at the Federal Law Enforcement Training Center in Glynco, Georgia. As a result of my training and experience as a federal agent, I am familiar with and have consulted with other agents who have been involved in numerous investigations of violations of federal firearms laws.

2. The statements contained in this affidavit are based on my personal observations, a review of Detroit Police Department Reports, and my involvement in this investigation. This affidavit also includes information provided to me by and/or through other law enforcement

agents, investigators and individuals with knowledge of this matter, my investigation, victim statements, the review of evidence recovered, and the review of documents. This affidavit summarizes such information but does not provide each and every detail I know regarding this investigation; rather it provides information necessary to establish probable cause that Kedar SALTER violated Title 18, United States Code, Section 922(g)(1), felon in possession of a firearm.

3. This affidavit is in support of a complaint and arrest warrant for Kedar SALTER.

II. INVESTIGATION AND PROBABLE CAUSE

Possession of a Firearm

4. On August 29, 2018, ATF agents executed a federal search warrant at ****4 Blackmoor Street, Detroit, MI. Based on surveillance and conversations with other law enforcement officers, agents were aware that this was the primary residence of Ray Battles. When the search warrant was executed, SALTER and a few other individuals were present at the location. Among the items seized from the residence were two (2) firearms, one of which was a silver and black Taurus G2C 9mm pistol, bearing serial number TL081427. A trace was conducted on this firearm,

and it was discovered that the firearm was registered to a female owner from Detroit, Michigan. On September 29, 2018, the female owner advised agents that the firearm was at her boyfriend's ("Cooperating Witness") residence.

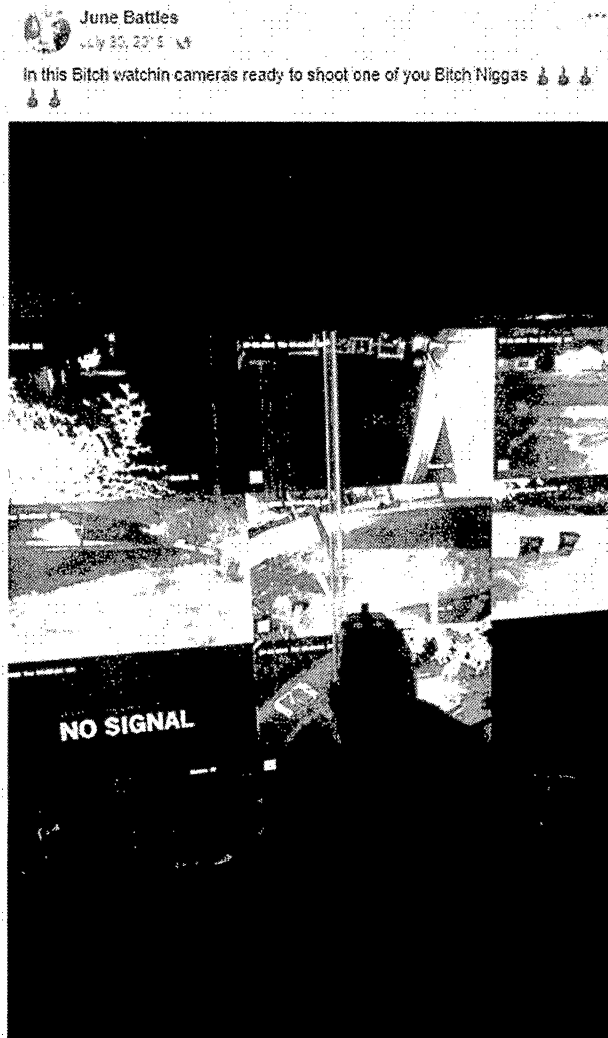
5. Also on September 29, 2018, an interview was conducted with Cooperating Witness. Cooperating Witness stated that he had been purchasing marijuana from Battles, SALTER, and other associates for approximately two years. At the end of July / beginning of August of 2018, Cooperating Witness was transporting his girlfriend's firearm, which he locked in the trunk of his vehicle, to his residence. Cooperating Witness advised that he ran into "K.D." (later identified as Kedar SALTER) while driving home. He offered to give SALTER a ride to ****4 Blackmoor Street. During the drive, Cooperating Witness received a phone call from his girlfriend. Talking to her on speakerphone, his girlfriend instructed him to drive carefully and go straight home because her firearm was locked in the trunk of his vehicle. SALTER, sitting in the passenger seat, heard the conversation regarding the firearm.

6. When Cooperating Witness and SALTER arrived at ****4 Blackmoor Street, SALTER departed the vehicle, placed a phone call, and

entered the residence, while Cooperating Witness was in the front yard of the residence talking to someone. A few minutes later, SALTER walked from the side of the residence up to Cooperating Witness' vehicle, put a firearm to Cooperating Witness' head, and demanded Cooperating Witness open the trunk and give him what was in there (the firearm). Cooperating Witness advised that SALTER instructed him not to call the cops or retaliate or "it's on."

7. On July 30, 2018, Battles posted the below photograph (Image 1) of what appears to be Battles pointing a handgun at his surveillance camera monitor. At the time of this post, Battles was prohibited from possessing firearms. During the interview with Cooperating Witness, Cooperating Witness reported that Battles posted a photograph on Facebook of himself pointing a pistol at the surveillance monitor at ****4 Blackmoor Street ("Subject Premises"). Cooperating Witness stated this was his girlfriend's pistol that SALTER stole from him during the armed robbery in July or August of 2018. Image 1 appears to be the photo referenced by the victim.

Image 1:



8. On February 4, 2019, I reviewed surveillance footage from surveillance cameras seized from ****4 Blackmoor Street during the execution of the federal search warrant on August 29, 2018. The footage shows SALTER exiting the Subject Premises through the front door and standing on the porch (Image 2), where he met with an unidentified black male (Subject 1), wearing a white t-shirt and jeans. SALTER reached into his right pants pocket with his right hand (Image 3) and pulled out a

firearm (Image 4). The firearm appeared to be a semi-automatic pistol with a black frame and a silver upper receiver (Image 5). SALTER and the unidentified individual appeared to converse and point at something in the front yard. SALTER appeared to put the firearm back into his pants pocket and pulled it out again approximately a minute later. SALTER and the unidentified individual then entered the Subject Premises. This firearm, that SALTER was observed possessing, matches the description of the firearm that SALTER had previously stolen from Cooperating Witness.

Image 2:



Image 3:



Image 4:

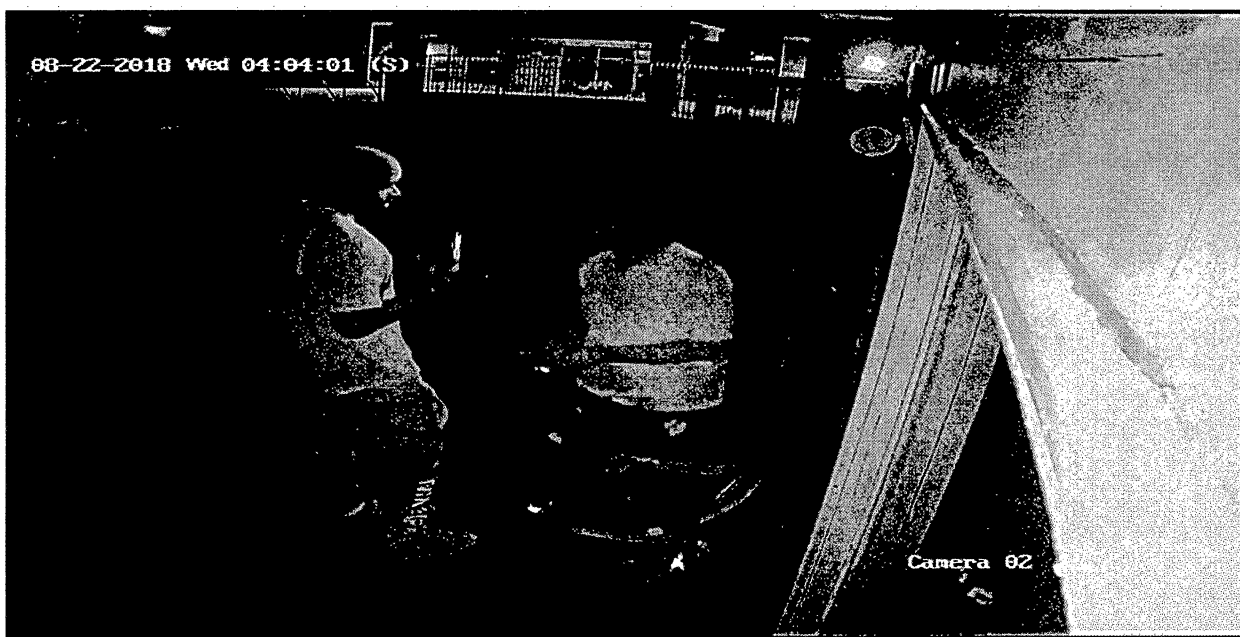


Image 5:



9. On February 15, 2018, another federal search warrant was executed at ****4 Blackmoor Street. SALTER was found hiding in the upstairs bedroom of the residence. During a post-Miranda interview with SALTER, he stated that the firearm that was recovered during the previous federal search warrant on August 29, 2018, was in the possession of the guy with the dreadlocks.

SALTER's Felony Status

10. A review of SALTER's criminal history showed he was convicted by Michigan's Third Judicial Circuit Court of felony home invasion in 2010.

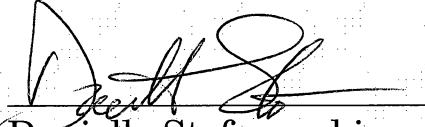
Interstate Nexus

11. On February 20, 2019, Special Agent Michael Parson advised, based on a verbal description of the firearm, without physically examining the firearm, that the aforementioned firearm was manufactured outside the state of Michigan and therefore had traveled through interstate and/or foreign commerce.

III. CONCLUSION

12. Based on the above investigation, probable cause exists that Kedar SALTER, a convicted felon, possessed a firearm that had previously traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1).

Respectfully Submitted,


Danielle Stefanovski
Special Agent, ATF

Subscribed and sworn before me on
February 21, 2019



Hon. R. Steven Whalen
United States Magistrate Judge